

August 2, 2017

Mr. Robert A. Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, Mail Code: R-19J
Chicago, IL 60604-3507

RE: State of Minnesota Updated Designation Recommendation for 2010 Primary National Ambient Air Quality
Standard for Sulfur Dioxide

Dear Mr. Kaplan:

Pursuant to Section 107(d) of the Clean Air Act, and as directed by the July 22, 2016, memorandum "Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard – Round 3," the Minnesota Pollution Control Agency (MPCA), on behalf of Governor Mark Dayton, hereby submits the following revised designation recommendation and supporting information for Goodhue County for the 2010 one-hour National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂).

In Table 3 of its letter dated January 13, 2017, the MPCA submitted a designation recommendation of "attainment/unclassifiable" for Goodhue County. Since the letter was submitted, the MPCA has learned that on May 1, 2017, USG Interiors, LLC (USG) provided the United States Environmental Protection Agency (EPA) with an air dispersion modeling report that identified exceedances with the 2010 one-hour NAAQS for SO₂ for its Red Wing facility, located at 27384 Highway 61 Boulevard in Goodhue County. USG conducted this modeling exercise that predicted the ambient impact of the actual emissions at its Red Wing facility for a reason unrelated to the SO₂ designation process.

The MPCA has actively been working with USG to address these modelling results. USG has committed to restricting public access to the area where the predicted exceedance occurred. The access restriction will remove this area from the definition of ambient air. The MPCA will enter into an enforceable agreement with the facility to ensure that this access restriction is in place by September 30, 2017. If, based on this information, EPA cannot move forward with the MPCA's "attainment/unclassifiable" designation recommendation, then the MPCA recommends a designation of "unclassifiable" for Goodhue County.

As Commissioner of the MPCA, I am duly authorized by the Governor of the State of Minnesota to submit this letter on his behalf. If you have questions or comments on this submission, please contact Mary Jean Fenske of my staff at 651-757-2354.

Sincerely,



John Linc Stine
Commissioner

JLS/CS:je